

**EXHIBIT 1
REDACTED VERSION OF
DOCUMENT FILED
UNDER SEAL**

HIGHLY CONFIDENTIAL: ATTORNEYS' EYES ONLY

16 VIDEOTAPED DEPOSITION OF DMITRI DOLGOV
17 PALO ALTO, CALIFORNIA
18 TUESDAY, AUGUST 8, 2017

22 BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~
23 CSR LICENSE NO. 9830
24 JOB NO. 2664656
25 Pages 1 - 156

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13 Videotaped Deposition of Dmitri Dolgov,
14 taken on behalf of the Defendants, on August 8,
15 2017, at Morrison & Foerster LLP, 950 Page Mill
16 Road, Palo Alto, California, beginning 2:11 p.m.,
17 and commencing at 6:00 p.m., Pursuant to Notice,
18 and before me, ANDREA M. IGNACIO, CSR, RPR, CRR,
19 CLR ~ License No. 9830.

1	A I'm not aware of that.	17:49
2	MR. LIN: Okay. That's all I have.	17:49
3	MR. JAFFE: So I -- I have some brief	17:49
4	questions. I can do it from this seat, or we can --	17:49
5	we can trade spots. Up to you guys. I don't care.	17:49
6	MR. LLEWELLYN: I'm fine with you doing it	17:49
7	from there.	17:49
8	MR. JAFFE: Okay.	17:49
9		17:49
10	EXAMINATION	17:49
11	BY MR. JAFFE:	17:49
12	Q Dr. Dolgov, I'm -- I'm going to make this go	17:49
13	as quickly as humanly possible.	17:49
14	Can you please grab 1360 from your stack.	17:49
15	A (Witness complies.)	17:49
16	Q It's the e-mail thread with the subject line:	17:49
17	"Laser/camera thoughts."	17:50
18	A Yeah.	17:50
19	Q So I want to take you to the e-mail at the --	17:50
20	at the bottom of the page, dated June 19, 2015.	17:50
21	Do you see that?	17:50
22	A I do.	17:50
23	Q Okay. What was your position on the	17:50
24	self-driving project as of June 15, 2015?	17:50
25	A I led the software team.	17:50

1	A	I think Mama Bear.	17:51
2	Q	Did Waymo, or Project Chauffeur before that,	17:51
3	[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]	[REDACTED]
20	Q	And what was your role personally in that --	17:52
21		in those discussions?	17:52
22	A	I'm not sure I can recall those directly. I	17:53
23		think those were in pretty early days of the team. I	17:53
24		think, at that time, I worked or maybe led the effort	17:53
25		that was focused on planning at -- maybe at that point	17:53

1 I led the on-board software team. 17:53
2 But regardless of that role, I think I was 17:53
3 one of the experienced -- more experienced software 17:53
4 engineers on the team. 17:53
5 So, I was involved in kind of the discussions 17:53
6 [REDACTED] [REDACTED]
20 Q Okay. So going back to 1360. 17:54
21 Actually, before we get there, if you can 17:54
22 look at 1361. 17:54
23 A (Witness complies.) 17:54
24 Got it. 17:55
25 Q So in the -- in the middle e-mail here, there 17:55

1 is a -- there is a list of items the follow-on actions 17:55
2 are. 17:55
3 Do you see that? 17:55
4 A I do. 17:55
5 Q And No. 2 says: 17:55
6 [REDACTED] [REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
8 Do you see that? 17:55
9 A I do. 17:55
10 Q What does [REDACTED] refer to here? 17:55
11 A I -- my understanding is that this is a 17:55
12 [REDACTED] [REDACTED]
21 MR. JAFFE: All right. 17:56
22 Let's mark this next document as 602. And 17:56
23 it's a big piece of paper, so hat's off to the -- the 17:56
24 file room for printing this off. 17:56
25 MR. LLEWELLYN: Counsel, I just want to 17:56

1 clarify. Do you think this redirect is responsive to 17:56
2 something that was raised in the course of his 17:56
3 deposition? 17:56
4 MR. JAFFE: Yep. 17:56
5 (Document marked Exhibit 602 17:56
6 for identification.) 17:56
7 MR. JAFFE: Dr. Dolgov, I've marked as 17:56
8 Exhibit 602. 17:56
9 Q Are these [REDACTED] that were 17:56
10 referred -- that you just referred to? 17:56
11 A I can't be exactly confident, but that 17:57
12 mention in the e-mail looks like it has a link. I 17:57
13 can't be, you know, confident. I can't know for sure 17:57
14 if it links to that document, that spreadsheet. But 17:57
15 the spirit of it, as I described it, is -- is -- is 17:57
16 accurate, yeah. 17:57
17 Q Okay. So, in just looking at the information 17:57
18 on the left-hand side, in the left-hand-most column, 17:57
19 [REDACTED] where did these 17:57
20 entries in the leftmost column come from? 17:57
21 MR. LLEWELLYN: So Counsel, I'm going to 17:57
22 object to all of this as beyond the scope of proper 17:57
23 redirect. 17:57
24 MR. JAFFE: Q. Go ahead. 17:57
25 [REDACTED] 17:57

1 [REDACTED] [REDACTED]
2 [REDACTED] [REDACTED]
3 [REDACTED] [REDACTED]
4 [REDACTED] [REDACTED] 17:58
5 Q Is the information in this document, such as [REDACTED] 17:58
6 in the left-hand corner, is -- is this kept -- kept [REDACTED] 17:58
7 confidential within Waymo? [REDACTED] 17:58
8 A I would expect so. I mean, by default, [REDACTED] 17:58
9 everything that we have to do, especially things that [REDACTED] 17:58
10 are essence as the -- [REDACTED] [REDACTED]
11 [REDACTED] [REDACTED] are kept confidential. [REDACTED] 17:58
12 Q And why are the -- [REDACTED] [REDACTED]
13 [REDACTED] [REDACTED] -- why is that in particular [REDACTED] 17:58
14 sensitive? [REDACTED] 17:58
15 A Oh, this is, in a way, a product of the [REDACTED] 17:58
16 experience that the team has accumulated over the [REDACTED] 17:58
17 years of working on this technology, understanding, [REDACTED] 17:58
18 you know, [REDACTED] [REDACTED]
19 [REDACTED] [REDACTED]
20 [REDACTED] [REDACTED]
21 [REDACTED] [REDACTED] 17:59
22 Q Would Waymo share the information in [REDACTED] 17:59
23 Exhibit 602 with a competitor? [REDACTED] 17:59
24 A Not unless there were really good reasons to [REDACTED] 17:59

1 do so. 17:59

2 Q And do you have any personal knowledge 17:59

3 regarding the value of -- of this information to Waymo 17:59

4 in the self-driving car project? 17:59

5 A I can't -- I'm not sure if I can quantify the 17:59

6 value. But it -- as I just mentioned, it's -- in my 17:59

7 mind, the value is tremendous because it captures the 17:59

8 experience accumulated over the course of developing 17:59

9 the system and trying different ideas and 18:00

10 understanding, you know, [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] 18:00

13 Q And, to your knowledge, is the information 18:00

14 contained in this document, Exhibit 602 -- does it 18:00

15 reflect -- is it in the public domain? 18:00

16 A Not that I'm aware of. 18:00

17 Q Okay. 18:00

18 MR. JAFFE: All right. No further questions. 18:00

19 MR. LLEWELLYN: I have a further question. 18:00

20 18:00

21 FURTHER EXAMINATION 18:00

22 BY MR. LLEWELLYN: 18:00

23 Q You testified that you couldn't be sure 18:00

24 whether this newly marked exhibit was, in fact, the 18:00

25 [REDACTED] that were specifically called out in 18:00